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April 29, 2021

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*
S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

MDC Legal persists in falsely accusing Ms. Maxwell's counsel of violating MDC Brooklyn's legal visit procedures. This allegation is reckless, false, and defamatory. At no time did counsel provide documents to Ms. Maxwell for her retention that did not originate from Ms. Maxwell. The April 29th letter from MDC Legal states that "supervisory staff...reviewed video surveillance footage" but notably does not state the contents of that video surveillance. The fact that MDC Legal does not claim to have reviewed the video or report the contents of the video footage speaks volumes.

Further and contrary to MDC's letter, MDC staff did in fact "seize and retain" Ms. Maxwell's confidential legal documents after the legal visit on April 24th. While most of those documents were returned to Ms. Maxwell, other documents, which the MDC concedes were "confiscated," were not returned to her but rather given to her counsel the next day. As previously stated, documents returned to Ms. Maxwell's counsel was "legal mail" which had been sent to Ms. Maxwell some time prior to April 24th. Counsel did not bring those documents into the facility.

The MDC admits, and flouts the fact, that guards read Ms. Maxwell's confidential materials. This is no small matter. Ms. Maxwell is working tirelessly to review and discuss with her attorneys literally millions of pages of documents. Deterioration of her confidential communications with her attorneys does not produce a fair and just trial.

We press our request that the Court direct the MDC to provide Ms. Maxwell's counsel with a copy of the video recording.

Very truly yours,

Bobbi C. Sternheim
BOBBI C. STERNHEIM

cc: All counsel of record

MDC Legal